

# EXHIBIT 2

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**From:** Gilmore, Jamison  
**Sent:** Thursday, July 24, 2025 1:44 PM  
**To:** Murphy, Michael D.  
**Cc:** Follett, Matthew; Schiraldi, Michael V.; Nwasike, Jessica; Arjam, Farshid; Malynn, Todd M.; Beral, Arash  
**Subject:** RE: SPAVI v. PCJV USA, LLC, et al.; Exhibits and Pretrial Documents

Mr. Murphy,

Please see below.

1. We do dispute your position and characterization of the five previously disclosed and identified state-court pleadings in your possession and the 2025 financial records referenced at Mr. Engel's deposition/in a report, which make up the balance of your first point.
2. The parties have now exchanged their trial exhibits as agreed at 1:00 pm. Your request that we undo our organization of exhibits we provided to you 16 minutes before our exchange was unreasonable. We welcome any meet and confer regarding any objections.
3. We will review your exhibits and should be prepared by 3:00 pm today to meet and confer on trial exhibits.
4. We cannot meaningfully meet and confer on any changes to jury instructions we have not seen. We need, at a minimum, a meaningful outline of proposed changes or identification of which jury instructions are at issue by 2:00 pm.

There was no agreement to a stipulation two days ago, but an effort to cooperate. After you proposed the idea, we asked you to send a proposal the same day. You did not. We have considered the draft we received today, and informed you by email, and Matt when we telephonically met and conferred today, why we do not believe the stipulation is acceptable, sufficient, or compliant with the court's orders and direction. Among other things, it is not accurate and appears designed to unfairly prejudice our clients further.

Thank you,

**Jamison T. Gilmore** | BLANKROME

2029 Century Park East | 6th Floor | Los Angeles, CA 90067

+1 (424) 239-3843 | [jamison.gilmore@blankrome.com](mailto:jamison.gilmore@blankrome.com)

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**From:** Murphy, Michael D. <mdmurphy@foxrothschild.com>  
**Sent:** Thursday, July 24, 2025 12:44 PM  
**To:** Gilmore, Jamison <Jamison.Gilmore@blankrome.com>  
**Cc:** Follett, Matthew <MFollett@foxrothschild.com>; Schiraldi, Michael V. <MSchiraldi@foxrothschild.com>; Nwasike, Jessica <jnwasike@foxrothschild.com>; Arjam, Farshid <Farjam@foxrothschild.com>; Malynn, Todd M. <Todd.Malynn@BlankRome.com>; Beral, Arash <arash.beral@blankrome.com>  
**Subject:** RE: SPAVI v. PCJV USA, LLC, et al.; Exhibits and Pretrial Documents

Jamison:


1. You do not dispute that there are exhibits on your reorganized list we received yesterday not previously identified, including the 27 I listed in my email from 10:51.
2. We agree to an exchange of 1 (preferably 1:30, as I am not back from Court yet), however that exchange must be as to exhibits identified on the list already filed with the Court. If you exchange exhibits and they conform to the new list you provided yesterday, that will not be in compliance.
3. If you wish to meet and confer over your new list, lets schedule that. I am not saying no, but we need to meet and confer on it
4. I propose a meet and confer at 3 pm today regarding jury instructions. The problem is that your instructions have incorrect statements of the law throughout. Redlining it has become a near impossibility because it is all redlines. Let's get on a call and go through them. It will take as long as it takes.
5. 36 hours ago, you said you agreed to new deadlines for filing. You now change your mind. Please review the stip we sent earlier, and I think that is the best way to go.




---

**Michael Murphy**

Partner

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 (310) 974-2271 (cell)

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---

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**From:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Sent:** Thursday, July 24, 2025 12:05 PM

**To:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>

**Cc:** Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Arjam, Farshid <[Farjam@foxrothschild.com](mailto:Farjam@foxrothschild.com)>; Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Subject:** [EXT] RE: SPAVI v. PCJV USA, LLC, et al.; Exhibits and Pretrial Documents

Mr. Murphy,

You agreed during our July 3 meet and confer to exchange exhibits on July 11. Your email below confirms what I have twice reported, what the redline you requested shows, and what you can confirm when we exchange exhibits and meet and confer upon objections. If you object to any exhibit, including the ones listed below, as not being produced in discovery or previously identified, there is a procedure for that. Please follow that procedure.

Further:

- 1) We agree to a 1pm complete exhibit exchange. Please confirm you will send any amended exhibit list with a complete set of your exhibits.
- 2) Separate meet and confers is inefficient use of time and does not allow us to prepare for tomorrow's filing.
- 3) We need your redlines to jury instructions and proposed stipulated facts, in addition to a draft pretrial conference order, today to prevent further prejudice you have caused our clients in having to respond to the same within 24 hours of filing a joint filing deadline. Please provide: (1) a time certain for **today** that you will provide us the jury instruction, proposed stipulated facts edits and draft pre-trial conference order and (2) a time to meet and confer **today** that is at least 3 hours after the time you provide us with the same.

At this time, we are unable to agree to the stipulation as currently drafted, but reiterate our request for a joint conference with the Court if the above is not met. We are concerned that there has not been sufficient good faith meet and confer, given the significant delay in providing proposed jury instructions and the lack of commitment to serving exhibits on July 11, despite our readiness to proceed. We hope we can work together to address these issues and move forward cooperatively.

Thank you,

**Jamison T. Gilmore** | BLANKROME

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**From:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>

**Sent:** Thursday, July 24, 2025 10:51 AM

**To:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Cc:** Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Subject:** Re: SPAVI v. PCJV USA, LLC, et al.; Exhibits and Pretrial Documents

1. I am not ignoring deadlines. **You introduced a wholly new exhibit list yesterday with exhibits never previously identified.** This threw a wrench into everything. Below is my proposal for

resolution. We need to resolve this informally. I did not cause this, but am offering a way for us to resolve this.

2. Proposal:

- a. I am in Court. Will be at my office at 1 pm.
- b. Exchange exhibits at 1 (you have 500+, we have barely more than 100)
- c. Video meet and confer at 2 to discuss documents and exhibit list
- d. Tomorrow at 10, meet and confer by video (or at my office) re stip facts and jury instructions
- e. **We need to get a stip asking for a few days to the Court, as this will allow us time to exhaust our negotiation**

3. **The following are examples of documents contained in yesterday's exhibit list not previously identified on your first exhibit list.** If I am wrong, please tell me where in your prior exhibit list, these documents are found. I have not said we wont agree to new exhibits, but just that we be open about it rather than call it a "reorganization."

- a. 1077 - First Amended Complaint of Cinco Corporation and Potato Corner International, Inc., filed August 24, 2018
- b. 1078 - Verified Second Amended Complaint of Cinco Corporation and Potato Corner International, Inc., filed December 18, 2018
- c. 1084 - Declaration of Jose P. Magsaysay, Jr. filed In Support Of Plaintiff Potato Corner International, Inc.'s Motion for Preliminary Injunction, filed May 15, 2019
- d. 1089 - Verified Response of Cross-Defendant Amir Jacoby to Demurrer to Cross-Defendant PCJV USA, LLC, et al. to the First Amended Complaint of Plaintiffs Cinco Corporation and PCI, filed October 26, 2018
- e. 1576 - 10/10/18 PCJV USA, LLC's, et al. First Amended Cross-Complaint
- f. 1578. 6/30/25 Balance Sheets – J&K Americana LLC
- g. 1579. 1/2025-6/2025 Profit and Loss Statements – J&K Americana LLC
- h. 1580. 6/30/25 Balance Sheets – GK Cerritos LLC
- i. 1581. 1/2025-6/2025 Profit and Loss Statements – GK Cerritos LLC
- j. 1582. 6/30/25 Balance Sheets – J&K Lakewood LLC
- k. 1583. 1/2025-6/2025 Profit and Loss Statements – J&K Lakewood LLC
- l. 1584. 6/30/25 Balance Sheets – HLK Milpitas LLC
- m. 1585. 1/2025-6/2025 Profit and Loss Statements – HLK Milpitas LLC
- n. 1586. 6/30/25 Balance Sheets – J&K Ontario, LLC
- o. 1587. 1/2025-6/2025 Profit Loss Statements – J&K Ontario, LLC
- p. 1588. 6/30/25 Balance Sheets – NKM Capital Group LLC
- q. 1589. 1/2025-6/2025 Profit and Loss Statements – NKM Capital Group LLC
- r. 1590. 6/30/25 Balance Sheets – GK Topanga, LLC
- s. 1591. 1/2025-6/2025 Profit and Loss Statements – GK Topanga, LLC
- t. 1592. 6/30/25 Balance Sheets – J&K Valley Fair LLC
- u. 1593. 1/2025-6/2026 Profit and Loss Statements – J&K Valley Fair LLC
- v. 1594. 3/31/25 Balance Sheets – PCI Trading LLC
- w. 1595. 1/2025-3/2025 Profit and Loss Statements – PCI Trading LLC
- x. 1596. 6/30/25 Balance Sheets – PCJV USA LLC
- y. 1597. 1/2025-6/2025 Profit and Loss Statements – PCJV USA LLC
- z. 1598. 6/30/25 Balance Sheets - GK Roseville, LLC

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**From:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>  
**Sent:** Thursday, July 24, 2025 10:24:00 AM  
**To:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>  
**Cc:** Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>;  
Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Malynn, Todd M.  
<[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Subject:** [EXT] RE: SPAVI v. PCJV USA, LLC, et al.; Exhibits and Pretrial Documents

Mr. Murphy,

Considering the Court's order last night and your persistent ignoring of deadlines, we believe Court intervention is necessary to get documents on file for trial—a stipulated continuance is insufficient. We propose a joint request to be heard tomorrow by the Court regarding outstanding pre-trial documents. If you do not agree to a joint request, we will request one unilaterally.

Thank you,

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**From:** Gilmore, Jamison  
**Sent:** Thursday, July 24, 2025 10:11 AM  
**To:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>  
**Cc:** Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>;  
Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Malynn, Todd M.  
<[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Subject:** RE: SPAVI v. PCJV USA, LLC, et al.; Exhibits and Pretrial Documents

Mr. Murphy,

As stated several times now, your characterization of exhibits as “new” is incorrect. The exhibits were produced in discovery or referenced at Mr. Engel's deposition/in his report. If you believe an exhibit was not properly listed or produced in discovery, please raise that objection during our meet and confer and include it in the challenged exhibit chart if we cannot resolve the objection. We will do the same after exhibits are exchanged including by objecting to any new exhibits or withdrawing the same.

There is no basis for further delay in exchanging exhibits, which you agreed to do last week. You have known the elements of SPAVI's case-in-chief from the outset and the proffered evidence to meet the same in discovery. Both parties are entitled to object to exhibits and are required to do so by tomorrow. We need to exchange documents to meet and confer and finish preparing objections.

It is entirely unfair to withhold exchanging exhibits until the day before we must object to your exhibits. We certainly cannot accept your proposal of a phased exhibit exchange where we would not get exhibits until after the court rules on a stipulation the day before a deadline when no prior exchange has taken place. Please confirm that we will be exchanging all exhibits by 1:00 pm today, including any new exhibits you intent to include in the final pretrial conference order.

We need to work towards meeting tomorrow's deadline regardless of whether there is a continuance. Relatedly, we need sufficient time to review your jury instruction edits before we meet and confer. Please provide: (1) a time certain for today that you will provide us the jury instruction edits and (2) a time to meet and confer today that is at least 3 hours after the time you provide us with the jury instruction edits. Your failure to provide these last month has been unduly prejudicial.

Thank you,

**Jamison T. Gilmore** | BLANKROME

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**From:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>

**Sent:** Thursday, July 24, 2025 9:11 AM

**To:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Cc:** Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Subject:** RE: SPAVI v. PCJV USA, LLC, et al.; Exhibits and Pretrial Documents

Jamison:

1. Please review the attached stip and revise as you prefer. We would like to get a stip and proposed order filed this morning. Please work with Jessica and Michael Schiraldi on that.
2. We will have to exchange exhibits in two phases. Today, at 1, we will provide you with exhibits already identified in our last list. 120 or so as you remember. You have waited to give yours to us even though it is almost 500 exhibits. We will identify objections and turn it around within a day
3. Tomorrow we will have an updated list with new exhibits. Won't be that many. We would have done this earlier if you had not waited until yesterday to disclose, for the first time, almost 100 new exhibits.
4. Tonight, you will receive revised jury instructions
5. I propose a 1 pm meet and confer tomorrow to discuss instructions, stip facts, and exhibit list.


Thanks




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**Michael Murphy**

Partner

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 (310) 974-2271 (cell)

 [mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)

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**From:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Sent:** Thursday, July 24, 2025 8:31 AM

**To:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>

**Cc:** Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Subject:** [EXT] RE: SPAVI v. PCJV USA, LLC, et al.; Exhibits and Pretrial Documents

Mr. Murphy,

Please provide times this morning for: (1) an exchange of exhibits, (2) your circulation of draft pretrial filings, and (3) a meet and confer on draft pretrial filings.

Thank you,

**Jamison T. Gilmore** | BLANKROME

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---

**From:** Gilmore, Jamison

**Sent:** Wednesday, July 23, 2025 8:14 PM

**To:** Michael D. Murphy <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>

**Cc:** Matthew Follett <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Michael V. Schiraldi <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Jessica Nwasike <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Farshid Arjam <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Subject:** RE: SPAVI v. PCJV USA, LLC, et al.; Exhibits and Pretrial Documents

Mr. Murphy,

Attached is the requested redline between our amended list I sent you and our initial list Arash sent you on 6/20. As you can see, and as I stated in my prior email, the first 89 exhibits are from our disclosures. Those documents are broken down from Exh. 1379. The other redline changes are typo corrections, disclosed broken down pleadings from the state court action, and 2025 financial documents (noted in Engel's report and referred to at his deposition). We do not believe these exhibits are objectionable, which you can confirm when we exchange exhibits. If you do have objections, those go into the challenged exhibits chart. We will do the same after we see your exhibits if we are unable to resolve objections.

It is imperative, now, that we exchange exhibits. We have been ready to exchange exhibits for over a week. The delay is causing unfair prejudice, especially since am leaving for a wedding Thursday evening.

Please confirm you are ready to exchange your exhibits. Thank you.

**Jamison T. Gilmore** | BLANKROME



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---

**From:** Gilmore, Jamison

**Sent:** Wednesday, July 23, 2025 5:37 PM

**To:** Michael D. Murphy <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>

**Cc:** Matthew Follett <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Michael V. Schiraldi <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Jessica Nwasike <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Farshid Arjam <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Subject:** Re: SPAVI v. PCJV USA, LLC, et al.; Exhibits and Pretrial Documents

Mr. Murphy,

I am currently driving home from the office. I will not be by my computer for another hour or so. I will provide a further response when I get access to my computer.

In the meantime, can you please provide a time that you will be ready to exchange exhibits?

Thank you,  
Jamison

On Jul 23, 2025, at 5:13 PM, Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)> wrote:

I asked for a redline of the current exhibit list from the last one (around 1:20 this afternoon).

This appears to be an entirely new exhibit list. I see well in excess of 100 exhibits I did not see on the last list, but I do not have the capacity to compare at this time. I need to see that redline.

If you are proposing that we agree that exhibits not identified previously be identified now, we can discuss that. Lets resolve that. But as I see it you have slipped in hundreds of new exhibits by calling it a reorganization.

Again, I do not necessarily object to adding exhibits not previously identified on the first list. But let's be open about it. Also, you have just added well over 100 exhibits. Our entire exhibit list is less than 200. You are increasing the work for us substantially at the end game. I do not think that is fair unless you are open about what is going on.



---

**Michael Murphy**

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**From:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>  
**Sent:** Wednesday, July 23, 2025 4:44 PM  
**To:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Schiraldi, Michael V. <[MSchiraldi@foxrothschild.com](mailto:MSchiraldi@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Subject:** [EXT] RE: SPAVI v. PCJV USA, LLC, et al.; Exhibits and Pretrial Documents

Mr. Murphy and team,

We still have not received your exhibits. Please send them.

Thank you,

**Jamison T. Gilmore** | BLANKROME  
2029 Century Park East | 6th Floor | Los Angeles, CA 90067  
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---

**From:** Gilmore, Jamison  
**Sent:** Wednesday, July 23, 2025 1:34 PM  
**To:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>; Schiraldi, Michael V. <[mschiraldi@foxrothschild.com](mailto:mschiraldi@foxrothschild.com)>  
**Subject:** RE: SPAVI v. PCJV USA, LLC, et al.; Exhibits and Pretrial Documents

Mr. Murphy,

As mentioned, I reorganized exhibits/numbering, breaking out attachments to listed exhibits and giving them their own exhibit numbers in light of your good comment at our last meeting to this effect. As to your question, all the exhibits in the amended list are filed pleadings and/or within the exhibits we listed in our initial list and are not “new,” save the 2025 financials (Exh. Nos. 1578-1599), which were referenced during Mr. Engel’s deposition and noted in his report. The first 89 exhibits are (now) the exhibits to Koren’s declaration in the state court case (which were served alongside our disclosures), which we decided to break out and put them at the beginning.

Thank you,

**Jamison T. Gilmore** | BLANKROME

2029 Century Park East | 6th Floor | Los Angeles, CA 90067

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---

**From:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>

**Sent:** Wednesday, July 23, 2025 12:24 PM

**To:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>

**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>

**Subject:** RE: SPAVI v. PCJV USA, LLC, et al.; Exhibits and Pretrial Documents

Jamison:

Would you please advise as to which of these, as renumbered are new (i.e. not identified on the last exhibit list?

I am in a mediation today and the bandwidth here is terrible. We may have to push a few hours.

Jessica will be circulating a proposed stip re more time. I am suggesting by Wednesday, 5 pm we submit.

Please always copy Michael Schiraldi on all communications. He is a paralegal who is working with me on this matter.

Thank you.


Thank you




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**Michael Murphy**

Partner

 (213) 213-1211

 (310) 974-2271 (cell)

 [mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)

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**From:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>  
**Sent:** Wednesday, July 23, 2025 12:03 PM  
**To:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>; Arjam, Farshid <[FArjam@foxrothschild.com](mailto:FArjam@foxrothschild.com)>; Nwasike, Jessica <[jnwasike@foxrothschild.com](mailto:jnwasike@foxrothschild.com)>; Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Subject:** [EXT] RE: SPAVI v. PCJV USA, LLC, et al.; Exhibits and Pretrial Documents

Mr. Murphy,

In advance of our exchange of exhibits, attached is an Amended Exhibit List that includes a reorganization of our exhibits to better conform with Judge Blumenfeld's order regarding trial exhibits.

Please:

1. confirm we are still exchanging all pre-trial documents at 1:00 pm today;
2. confirm you are preparing the stipulation and order to continue the pretrial conference for two days (let us know if you'd like assistance with this—we can draft the documents); and
3. provide times today and tomorrow you are available to meet and confer regarding the pretrial documents.

Thank you,

**Jamison T. Gilmore** | BLANKROME  
2029 Century Park East | 6th Floor | Los Angeles, CA 90067  
+1 (424) 239-3843 | [jamison.gilmore@blankrome.com](mailto:jamison.gilmore@blankrome.com)

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**From:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>  
**Sent:** Tuesday, July 22, 2025 9:29 PM  
**To:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>; Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>  
**Cc:** Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>  
**Subject:** RE: SPAVI v. PCJV USA, LLC, et al.; Exhibits and Pretrial Documents

Mike:

I'm in a hearing tomorrow morning. Could we agree on a 1 pm exchange on everything? Please also feel free to circulate a stip for more time.

Arash

**Arash Beral** | BLANKROME  
2029 Century Park East, Los Angeles, CA 90067  
[Arash Beral | Blank Rome LLP](#)

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**From:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>  
**Sent:** Tuesday, July 22, 2025 5:38 PM  
**To:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>  
**Cc:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>; Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>  
**Subject:** RE: SPAVI v. PCJV USA, LLC, et al.; Exhibits and Pretrial Documents

Mr. Gilmore:

Please, I beg of you, copy my colleagues Matt, Jessica, Farshid and With respect, you never contacted me, and you were the ones believing you need more time to evaluate fewer documents.

My recommendation is we swap tomorrow morning around 10 am. I suspect I can have my objections in within 24 hours. I think this will be one of the less times consuming parts of what is remaining to meet and confer upon.

How are you all on stipulated facts? I am hoping to have redlines to your jury instructions by tomorrow morning as well. But we definitely need to meet and confer because there are a lot of things you put in that I know your client really wants, but that cannot be read to a jury.

I recommend we jointly ask the Court for one or two more days to accommodate meeting and conferring. He will grant it.

Mike

<image001.jpg>

<image001.jpg>

Michael Murphy

Partner

<image001.jpg>

(213) 213-1211

<image001.jpg>

(310) 974-2271 (cell)

<image001.jpg>

[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)

<image001.jpg>

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**From:** Gilmore, Jamison <[Jamison.Gilmore@blankrome.com](mailto:Jamison.Gilmore@blankrome.com)>  
**Sent:** Monday, July 21, 2025 9:14 PM  
**To:** Murphy, Michael D. <[mdmurphy@foxrothschild.com](mailto:mdmurphy@foxrothschild.com)>

**Cc:** Beral, Arash <[arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)>; Malynn, Todd M. <[Todd.Malynn@BlankRome.com](mailto:Todd.Malynn@BlankRome.com)>; Follett, Matthew <[MFollett@foxrothschild.com](mailto:MFollett@foxrothschild.com)>  
**Subject:** [EXT] SPAVI v. PCJV USA, LLC, et al.; Exhibits and Pretrial Documents

Mr. Murphy:

I am following up on our last call. We did not hear from you on Tuesday (7/15) regarding a Wednesday (7/16) exhibit exchange as discussed. We also did not receive any pretrial documents from your firm over the weekend. Please advise as to when you are able to exchange exhibits soon as possible.

I am out this Friday for a wedding, and I want to ensure we have enough time to get Friday's set of filings together before I leave.

Thank you,

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